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December 6, 2020

VIA ECF

Hon. Mary Kay Vyskocil
United States District Judge, Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: *Shatsky v. PLO*, Case No. 1:18-cv-12355-MKV.

Dear Judge Vyskocil:

On behalf of Defendants, the Palestinian Authority (“PA”) and the Palestine Liberation Organization (“PLO”), and pursuant to Rule 2(G) of Your Honor’s Individual Rules of Practice in Civil Cases, we write to seek an extension of time to respond to Plaintiffs’ Amended Complaint (Dkt. #50) of three business days, from December 9, 2020, through and including December 14, 2020, reserving all of Defendants’ defenses and objections, including objections to jurisdiction.

Plaintiffs have consented to this request. This is Defendants’ first request for an extension of time to respond to the Amended Complaint. The requested extension does not affect any other scheduled dates.

We make this request in an abundance of caution, understanding the Court’s guidance during the November 6, 2020, pre-motion conference that it would enter an “order with instructions about how we’re going to proceed once we get an amended complaint.” See Tr. (11/6/20) at 37:5-38:2.

Beyond Plaintiffs’ consent, there is good cause for this extension. Plaintiffs’ 60-page Amended Complaint is more than twice as long as the original Complaint and adds a significant number of new allegations. Defendants need additional time to assess and prepare an appropriate response to the Amended Complaint.

Accordingly, Defendants respectfully request that the Court extend Defendants’ time to respond to the Amended Complaint in this action through and including December 14, 2020.

We thank the Court in advance for its consideration of this request.

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Respectfully submitted,

Squire Patton Boggs (US) LLP



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